Shaw Environmental & Infrastructure, Inc.

4171 Essen Lane Baton Rouge, LA 225 932-2500

FAX: 225-987-7300



" Shaw Environmental & Infrastructure, Inc.

June 26, 2006

Project No.: 118267 HAND DELIVERED

Mr. Keith Casanova, Administrator Remediation Services Division Department of Environmental Quality P. O. Box 82178 Baton Rouge, LA 70884-2282

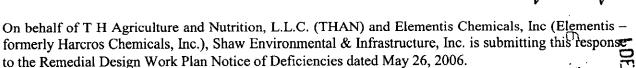
RE:

NOD Response

7700 Earhart Boulevard Facility

New Orleans, Louisiana Agency Interest Number 1275

Dear Mr. Casanova:



Should you have any question please contact me at (225) 987-7326.

Sincerely,

Shaw Environmental & Infrastructure, Inc.

Kenneth P. Romero, PG

Kemmo Komes

Project Manager

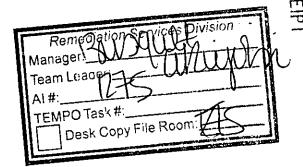
cc:

Mr. Jack Cleary - THAN (1 copies)

Mr. Glen Cavanaugh – Elementis (1 copies)

Mr. Dwayne Johnson - Kean, Miller, et al. (1 copy)

Project Files – (2 copies)





LDEQ



DEPARTMENT OF ENVIRONMENTAL QUALITY

YDECEIVED MAY 3 0 2006

KATHLEEN BABINEAUX BLANCO
GOVERNOR

MIKE D. McDANIEL, Ph.D. SECRETARY

May 26, 2006

CERTIFIED – RETURN RECEIPT REQUESTED 7003 2260 0000 5823 7410

John P. Cleary, P.E. T H Agriculture & Nutrition, L.L.C. 15313 West 95th Street Lenexa, Kansas 66219

RE: Remedial Design Work Plan

Thompson Hayward in New Orleans; AI Number 1275 7700 Earhart Boulevard, New Orleans, Orleans Parish, Louisiana

Dear Mr. Cleary:

The Louisiana Department of Environmental Quality – Remediation Services Division (LDEQ-RSD) has completed its review of the Remedial Design Work Plan document dated March, 2006, and submitted on your behalf by Shaw Environmental and Infrastructure, Incorporated.

Based on a technical review of the above-referenced document, several deficiencies have been identified. Please find attached a "Notice of Deficiencies" (NODs) which details specific technical and/or regulatory deficiencies. Please submit an updated work plan or an addendum to the current work plan that addresses these deficiencies, and meets all appropriate requirements specified in the 1997 Cooperative Agreement between the State and responsible parties. You are hereby notified that failure or refusal to comply with this notice may subject your company to possible enforcement procedures as mandated by the Louisiana Environmental Quality Act, La. R.S. 30:2001 et seq., and particularly Section 2025 C (3) of the Act.

Responses to the NODs should be submitted as a stand-alone document. Please label the document clearly showing the submission date of the document and to which NOD comment(s) you are responding. These responses should be submitted to the Department thirty days (30) from the date of this letter.

Please contact me at (225) 219-3199 with any questions. All correspondence must include the Agency Interest number (AI #) 1275 and should be submitted in triplicate to:

Keith L. Casanova, Administrator Remediation Services Division P.O. Box 4314 Baton Rouge, LA 70821-4314.

ENVIRONMENTAL ASSESSMENT

: PO BOX 4314, BATON ROUGE, LA 70821-4314 P:225-219-3236 F:225-219-3239 WWW.DEQ.LOUISIANA.GOV Thank you for cooperation.

Sincerely,

Edwin Akujobi, Staff Environmental Scientist

Remediation Services Division

Attachment: Notice of Deficiencies

c: Imaging Document - IAS

NOTICE OF DEFICIENCIES March 2006 Remedial Design Work Plan 7700 Earhart Boulevard Facility (Former Thompson Hayward Facility) AI # 1275

- 1. Provide a mechanism for ongoing communication between the Responsible Parties (RPs) and the community members living and working in the vicinity of the site.
- 2. The remediation schedule provided as Figure 8.1 is deemed as very aggressive by the LDEQ. Please revise and submit a more realistic schedule.
- 3. Because Memorial Hospital is reported to still be closed, identify an alternative hospital and provide all needed Health and Safety Plan information.
- 4. Develop and submit a hurricane contingency plan capable of providing reasonable protection to life and property should this site be affected by hurricane conditions. The plan should also identify events that will trigger the implementation of the hurricane plan.
- 5. Although the soils located from 0 to 10 feet below ground surface (bgs) are subject to the Remedial Action Levels (RALs), the Department will require that soil concentration(s) below 10 feet meet leaching requirements that are protective of groundwater. Please provide a mechanism for meeting these requirements.
- 6. The local community has expressed concerns regarding possible noise that will be generated as a result of the remedial action. To provide for noise abatement they request that the proposed 7:30 am to 7:30 pm work hours be changed. The LDEQ will require that site work hours meet the requirements of the applicable New Orleans city codes regarding allowable schedules for the operation of heavy equipment. Please provide the Department with information regarding requirements of the city's code with respect to this issue.
- 7. Information regarding the nature of land use controls such as conveyance notification, deed restriction, etc., to be placed on the property after remediation is not included in the remedial work plan. Please furnish this information.
- 8. Although the plan cites low perimeter air monitoring levels for preventive action, the Department will require that you develop a contingency plan to notify the community if the perimeter readings exceed health-based protective levels. The plan should establish health-based protective levels and monitoring protocols. It should also specify the nature of, and the entity responsible for providing, the notification. Finally, the plan should include an evacuation plan and propose actions to be implemented to remedy the problem.

Response to Notice of Deficiencies March 2006 Remedial Design Work Plan 7700 Earhart Boulevard Facility AI # 1275

1. Provide a mechanism for ongoing communication between the Responsible Parties (RPs) and the community members living and working in the vicinity of the site.

Response:

The following items will be provided in order that the community will have the avenues necessary to contact someone with concerns and/or be provided with ongoing communications regarding the status of remedial activities:

- A telephone number to call that will be answered or where messages can be left 24-hours per day;
- An email address has been established for the project,;
- A webpage address that will provide a repository of fact sheets and remedial activities updates.

In addition to the above outlined communication tools, the following contact information is to be distributed as the LDEQ Team Leader in charge of handling questions and other issues.

 Name: Edwin Akujobi Phone: (225) 219-3199
 Fax: (225) 219-3239

Email: Edwin.akujobi@la.gov

2. The remediation schedule provided as Figure 8.1 is deemed as very aggressive by the LDEQ. Please revise and submit a more realistic schedule.

Response:

The project schedule, Figure 8.1, (Attachment A) has been revised as requested by the LDEQ and is attached. However, this schedule is still considered a draft schedule since the remedial services and transportation contractor(s) have not been selected. Once these contractor(s) are retained by THAN and schedule details have been resolved (such as equipment availability, disposal facility capacity, and work sequencing) a revised schedule will be prepared and submitted.

Page 1 of 6 June 2006

3. Because Memorial Hospital is reported to still be closed, identify an alternative hospital and provide all needed Health and Safety Plan information.

Response:

Tulane University Hospital & Clinic 1415 Tulane Avenue New Orleans, Louisiana 70112 (504) 988-5263

A revised hospital location map is included in the Figures section.

4. Develop and submit a hurricane contingency plan capable of providing reasonable protection to life and property should this site be affected by hurricane conditions. The plan should also identify events that will trigger the implementation of the hurricane plan.

Response:

The procedures outlined in the "Hurricane Contingency Plan" (Attachment B) will be followed to mitigate any potential hazards that could be caused in the event of a hurricane, tropical storm, or tropical depression. These procedures will be implemented once a storm system with a potential to cause excessive rainfall, destructive winds, tornados, and/or flooding has entered the Gulf of Mexico and there is a reasonable chance that said system would directly affect the coast of Southeastern Louisiana.

It must be noted that the projected start date of remedial activities is not anticipated to begin until the latter part of hurricane season that runs from June 1st until November 30th of each calendar year. There is also the possibility that the progression of remedial tasks may be reordered (i.e. demolish and remove warehouse near the beginning of the schedule) such that intrusive subsurface activities will not begin until hurricane season has passed.

5. Although the soils located from 0 to 10 feet below ground surface (bgs) are subject to the Remedial Action Levels (RALs), the Department will require that soil concentration(s) below 10 feet meet leaching requirements that are protective of groundwater. Please provide a mechanism for meeting these requirements.

Response:

· = .

Remedial activities that result in excavation of 10 feet or more bgs will include collection of one or more soil samples for the Synthetic Precipitation Leaching Procedure (EPA Method 1312). SPLP leachates will be analyzed for subsurface constituents of concern as listed in Table A-1 of "Addendum to Risk Assessment".

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(Revision 1)" (IT Corporation, April 25, 2002). Leachate concentrations will be compared to appropriate groundwater criteria selected per the methodology used in the approved risk assessment (IT Corporation, October 2001) and adjusted using a DAF Summers of 20 and a longitudinal DAF of 57 as determined for the water table zone in the approved risk assessment. For constituents not included in the previous groundwater to surface water evaluation in the approved risk assessment, RECAP GW3NDW standards will be developed and adjusted with the DAFs for comparison to SPLP leachate concentrations. If one or more constituent leachate concentrations exceed the respective groundwater criteria, then additional soil will be excavated and confirmatory sampling repeated.

6. The local community has expressed concerns regarding possible noise that will be generated as a result of the remedial action. To provide for noise abatement they request that the proposed 7:30 am to 7:30 pm work hours be changed. The LDEQ will require that site work hours meet the requirements of the applicable New Orleans city codes regarding allowable schedules for the operation of heavy equipment. Please provide the Department with information regarding requirements of the city's code with respect to this issue.

Response:

In accordance with the Code of Ordinances, City of New Orleans, Louisiana which states:

"Noises from construction and demolition activities for which a building permit has been issued by the department of safety and permits are exempt from Table 1 between 7:00 a.m. and 11:00 p.m. except in those areas zoned as RS, RD, or RM residential districts. Construction and/or demolition activities shall not begin before 7:00 a.m. or continue after 6:00 p.m. in areas zoned as RS, RD, or RM residential districts, or within 300 feet of such districts. Mufflers on construction equipment shall be maintained."

Construction activities will be conducted between the hours of 7:00 a.m. and 6:00 p.m. throughout the duration of the project. In addition, mufflers will be maintained on all construction equipment.

7. Information regarding the nature of land use controls such as conveyance notification, deed restriction, etc., to be placed on the property after remediation is not included in the remedial work plan. Please furnish this information.

Response:

Since residual constituent concentrations in soil will remain that are greater than the acceptable exposure concentration defined for non-industrial (residential) land use, institutional controls will be implemented. The institutional controls for the

Page 3 of 6

facility will require a legal instrument "Conveyance Notification" to be recorded in the parish conveyance records for the impacted property. The conveyance notification will clearly state the notice or restriction imposed on the site; the description of the site; and a scaled site map showing the affected soil zones.

8. Although the plan cites low perimeter air monitoring levels for preventive action, the Department will require that you develop a contingency plan to notify the community if the perimeter readings exceed health-based protective levels. The plan should establish health-based protective levels and monitoring protocols. It should also specify the nature of, and the entity responsible for providing the notification. Finally, the plan should include an evacuation plan and propose actions to be implemented to remedy the problem.

Response:

An Air Monitoring Plan has been approved by the LDEQ to monitor perimeter concentration levels. If there is a failure in the procedures and controls presented in the Air Monitoring Plan the following plan will be implemented to protect, notify, and evacuate the surrounding community. The means of determining if a situation requires emergency action and the procedures to carry out in the event of an emergency are detailed in this response.

Selection of the appropriate health-based protective level was based on a review of available public exposure guidelines, described in Attachment C, and consideration of site-related constituent concentrations. Because perchloroethylene (tetrachloroethylene) is the constituent found most frequently and at the highest concentrations on-site and, in addition, has the lowest public exposure guideline levels, the AEGL-1 for this constituent was selected as the level of concern (LOC) upon which to base public notification and protection procedures. The AEGL-1 level is lower than the ERPG-1 level for PCE. In addition, AEGL levels are applicable to the general population, including infants and children, and other individuals who may be susceptible. The AEGL-1 for perchloroethylene is 35 ppm for durations of 10 minutes to 8 hours.

For site air monitoring purposes, total VOC monitoring will be performed and results will be conservatively assumed to be entirely PCE unless compound-specific information can be obtained. If total VOC monitoring indicates levels of 35 ppm that are sustained for 60 minutes and compound-specific information cannot be obtained, then the public will be notified to shelter-in-place until such time as the VOC level decreases to less than 35 ppm and that lower level is sustained for 60 minutes. If after 4 hours of sheltering-in-place the VOC concentration remains at 35 ppm or if at any time during sheltering-in-place the VOC concentration continues to rise and sustains 75 ppm for one hour, the public will be notified to prepare for evacuation and evacuation procedures will be implemented. The upper level of 75 ppm was selected as the action level for evacuation because it is less than the AEGL-1 levels for PCE and the AEGL-1,

Page 4 of 6 June 2006

ERPG-1, and TEEL levels for the other site-related volatile constituents. Initiation of evacuation procedures at 75 ppm is anticipated to allow time for public evacuation to be completed prior to higher and potential harmful levels to be reached.

A stop work order will be issued if limits established by the Air Monitoring Plan are met, before monitoring reaches the shelter-in-place concentration. The source of pollution and engineering control measures will be implemented at this time, to prevent further increase. If the air monitoring exceedance is caused by a total failure of engineering controls, that cannot be immediately corrected, then this notification and evacuation procedure will be enacted:

- Emergency response personnel will delineate the impacted area using hand held air monitoring and communication equipment;
- A shelter-in-place notification will be issued to the residents on streets adjacent to the property and any other potentially affected residents;
- Shaw will contact 911, the New Orleans Police Department (NOPD) and the New Orleans Fire Department (NOFD) along with the New Orleans Office of Emergency Preparedness (OEP) to notify them of the potential emergency;
- Emergency response personnel will make an attempt to inform all residents within the impacted that they should remain inside, close doors, close windows, and turn off any air conditioning units.

If concentrations are maintained at the shelter-in-place concentration for four hours or the constituent concentration continues to elevate and reaches and sustains 75 ppm for one hour or continues to elevate past 75 ppm, the following will be implemented:

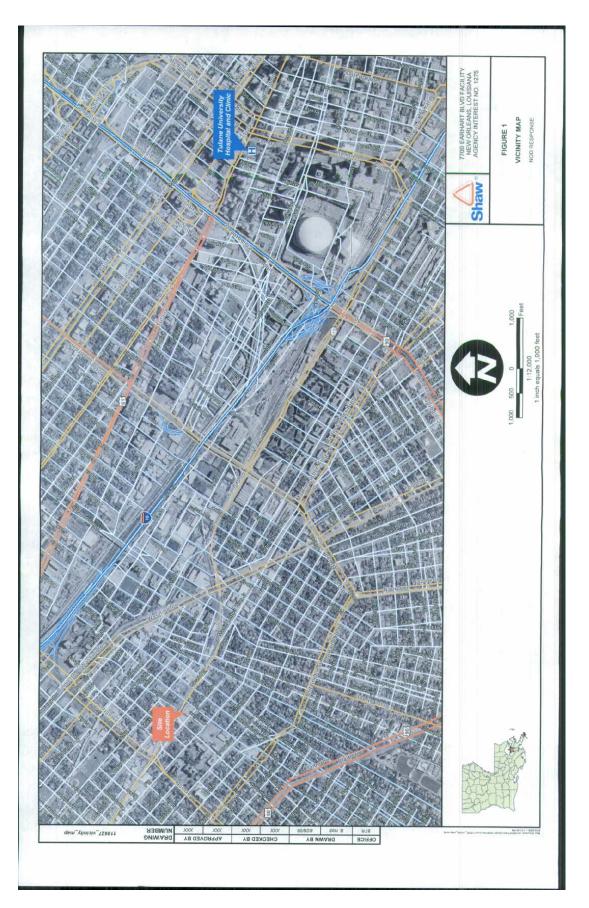
- The NOPD and NOFD will be notified that affected residents will be evacuated (the evacuation will require assistance from and coordination with the local authority);
- Emergency response and/or site personnel will delineate the impacted area using hand held air monitoring and communication equipment;
- Residents will be notified of evacuation on an individual basis, according to which areas are impacted by elevated constituent concentrations;
- Prior to commencement of excavation activities, a designated safe place will be determined in the event of a required evacuation;
- If any resident requires transportation to the designated safe place, it will be provided on an as needed basis;
- If an evacuation is ordered and any resident refuses to evacuate, the resident will be required to sign a waiver which notes that they are aware an evacuation is mandated and they refuse to do so;
- If the evacuation extends for 24 hours or greater, accommodations for residents temporary shelter will be made.

Page 5 of 6 June 2006

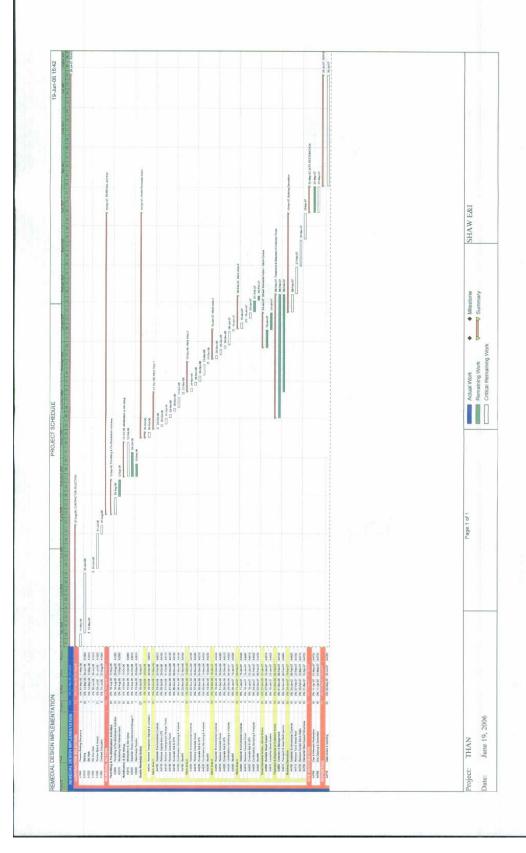
Before work begins, the 24-hour hotline will be equipped with the capacity to record an automated message that will allow residents to call and check the status of an emergency situation. If an emergency of the above stated magnitude exists and the notification and evacuation plan is enacted, the automated message shall be updated hourly to inform residents of the status of the emergency. If the emergency no longer poses any threat, the automated message will be updated accordingly.

June 2006

Figures



Attachment A



Attachment B

HURRICANE CONTINGENCY PLAN

Phase I: Initial Monitoring Activities

Once a tropical storm enters the Gulf of Mexico and its projected path is not well defined, at a minimum the following procedures will be implemented:

- The Contractor or Shaw will initiate communications with LDEQ regarding storm activity and inform the LDEQ that the storm is being monitored;
- Increased monitoring of the storm system(s) for the projected path and strength will take place daily;
- Subcontractors will be notified of the potential for demobilization and removal of equipment and waste.

Phase II: Initial Evacuation Activities

If the tropical storm or hurricane system continues to move north and becomes a direct threat to the northern gulf coast region and the projected path lies between Mobile, Alabama and Galveston, Texas and has a projected land fall within 96 hours the following activities must be enacted:

- Waste generation activities will be halted until the contractors are notified otherwise:
- Containerized waste will be transported off-site to the proper disposal facility, in a manner as fast and safe as possible;
- Backfill material will be mobilized to the site if not already on-site.

Phase III: Evacuation Activities

If within 72 hours of projected landfall, any portion of the state of Louisiana is within the anticipated landfall cone, implementation of the following evacuation procedures will commence:

- Notify the LDEQ of a planned shut down and evacuation;
- All empty waste containers staged on-site will be targeted for transport off-site;
- Any open excavations will be backfilled with clean fill material to a level determined to be adequate to minimize the migration of potentially hazardous constituents.
- All loose tools, equipment, and supplies will either be secured on-site or transported off-site to lessen the possibility of flying debris;

- Disassemble and transport off-site all electronically sensitive equipment and components;
- Secure office buildings and equipment storage facilities that will remain on-site during the storm;
- Demobilize all site personnel.

Attachment C

Public Exposure Guidelines

Acute Exposure Guideline Levels (AEGLs) represent threshold exposure limits to airborne chemicals for the general public and are applicable to emergency exposure periods ranging from 10 minutes to 8 hours acute exposure (USEPA, 2006). The process that has been established for the development of the AEGL values is the most comprehensive ever used for the determination of short-term exposure limits for acutely toxic chemicals. The recommended exposure levels are applicable to the general population, including infants and children, and other individuals who may be susceptible. Three AEGLs have been defined as follows:

- AEGL-1 is the airborne concentration of a substance above which it is predicted
 that the general population, including susceptible individuals, could experience
 notable discomfort, irritation, or certain asymptomatic nonsensory effects.
 However, the effects are not disabling and are transient and reversible upon
 cessation of exposure.
- AEGL-2 is the airborne concentration of a substance above which it is predicted
 that the general population, including susceptible individuals, could experience
 irreversible or other serious, long-lasting adverse health effects or an impaired
 ability to escape.
- AEGL-3 is the airborne concentration of a substance above which it is predicted
 that the general population, including susceptible individuals, could experience
 life-threatening adverse health effects or death.

AEGLs have been developed for several of the volatile constituents detected at the New Orleans site, *i.e*, tetrachloroethylene (perchloroethylene; PCE), trichloroethylene (TCE), and xylenes. AEGLs are not available for ethylbenzene..

Te	trachloroe	thylene 12'	7-18-4 (Inte	erim) pp	m
	10 min	30 min	60 min	4 hr	8 hr
AEGL 1	35	35	35	35	35
AEGL 2	230	230	230	120	81
AEGL 3	1,600	1,600	1,200	580	410

T	richloroetl	hylene 79-	01-6 (Inter	im) ppm	
	10 min	30 min	60 min	4 hr	8 hr
AEGL 1	260	180	130	84	77
AEGL 2	960	620	450	270	240
AEGL 3	6,100	6,100	3,800	1,500	970

	Xylenes 1330	-20-7 (In	terim) pj	om	
	10 min	30 min	60 min	4 hr	8 hr
AEGL 1	130	130	130	130	130
AEGL 2	2,500*	1,300*	920*	500	400
AEGL 3	See below**	3,600*	2,500*	1,300*	1,000*

Lower Explosive Limit (LEL) = 9,000 ppm

AEGL 3 - 10 min = **7,200 ppm

For values denoted as * safety considerations against the hazard(s) of explosion(s) must be taken into account

For values denoted as ** extreme safety considerations against the hazard(s) of explosion(s) must be taken into account

Other public exposure guidelines exist and include the Emergency Response Planning Guidelines (ERPGs) and Temporary Emergency Exposure Limits (TEELs). The EPRGs are developed by the ERPG committee of the American Industrial Hygiene Association (AIHA) and are three-tiered guidelines for one-hour contact duration. The TEELs are temporary levels of concern used by the Department of Energy when AEGLs and ERPGs are unavailable.

ERPGs are defined as follows:

- ERPG-1: The maximum concentration in air below which it is believed nearly
 all individuals could be exposed for up to one hour without experiencing other
 than mild transient adverse health effects or perceiving a clearly defined
 objectionable odor;
- ERPG-2: The maximum concentration in air below which it is believed nearly
 all individuals could be exposed for up to one hour without experiencing or
 developing irreversible or other serious health effects or symptoms that could
 impair their abilities to take protective action;
- EPRG-3: The maximum concentration in air below which it is believed nearly all individuals could be exposed for up to one hour without experiencing or developing life-threatening health effects.

ERPGs are available for PCE and TCE..

	Tetrachloroethylene (ppm)	Trichloroethylene (ppm)
ERPG-1	100	100
ERPG-2	200	500
ERPG-3	1,000	5,000

^{* = &}gt;10% LEL

^{** = &}gt;50% LEL

TEELs are used when AEGLs and ERPGS are unavailable and are defined as follows:

- TEEL-0: The threshold concentration below which most people will experience no appreciable risk of health effects;
- TEEL-1: The maximum concentration in air below which it is believed nearly all individuals could be exposed without experiencing other than mild transient adverse health effects or perceiving a clearly defined objectionable odor.
- TEEL-2: The maximum concentration in air below which it is believed nearly all
 individuals could be exposed without experiencing or developing irreversible or
 other serious health effects or symptoms that could impair their abilities to take
 protective action;
- TEEL-3: The maximum concentration in air below which it is believed nearly all
 individuals could be exposed without experiencing or developing life-threatening
 health effects.

TEELs were available for ethylbenzene.

	Ethyl Benzene	100-41-4 (ppm)	
TEEL-0	TEEL-1	TEEL-2	TEEL-3
100	125	125	800

Selection of Health-Based Level

Selection of the appropriate health-based protective level was based on a review of available public exposure guidelines described above and consideration of site-related constituent concentrations. Because perchloroethylene (tetrachloroethylene) is the constituent found most frequently and at the highest concentrations on-site and, in addition, has the lowest public exposure guideline levels, the AEGL-1 for this constituent was selected as the level of concern (LOC) upon which to base public notification and protection procedures. The AEGL-1 level is lower than the ERPG-1 level for PCE. In addition, AEGL levels are applicable to the general population, including infants and children, and other individuals who may be susceptible. The AEGL-1 for perchloroethylene is 35 ppm for durations of 10 minutes to 8 hours.

For site air monitoring purposes, total VOC monitoring will be performed and results will be conservatively assumed to be entirely PCE unless compound-specific information can be obtained in real-time. If total VOC monitoring indicates levels of 35 ppm that are sustained for 60 minutes and compound-specific information cannot be obtained in real-time, then the public will be notified to shelter-in-place until such time as the VOC level decreases to less than 35 ppm and that lower level is sustained for 60 minutes. If after 4 hours of sheltering-in-place the VOC concentration remains at 35 ppm or if at any time

during sheltering-in-place the VOC concentration continues to rise and reaches 75 ppm, the public will be notified to prepare for evacuation and evacuation procedures will be implemented. The upper level of 75 ppm was selected as the action level for evacuation because it is less than the AEGL-2 levels for PCE and the AEGL-1, ERPG-1, and TEEL levels for the other site-related volatile constituents. Initiation of evacuation procedures at 75 ppm is anticipated to allow time for public evacuation to be completed prior to higher and potential harmful levels to be reached.

References

Oak Ridge Associated Universities, 2006. http://www.orau.gov/emi/scapa

Office of Response and Restoration, National Oceanic and Atmospheric Administration, 2006. Public Exposure Guidelines; http://archive.orr.noaa.gov/cameo/locs/expguide.html

USEPA, 2006. Acute Exposure Guideline Levels; http://www.epa.gov/oppt/aegl/

TABLE A-1
PRELIMINARY REMEDIAL ACTION LEVELS
ADDENDUM TO RISK ASSESSMENT REVISION No.1
7700 Earnart Bouleward Facility
New Orleans, Louisiana

For Stormdi	For Stormdrain Sediment	1		For Surface Soils	ce Soils				For Sub-S	For Sub-Surface Soils		
						Target	Lower of Cancer Risk				Target	Lower of Cancer Risk
	The second	Tarnot Cancor			Target	Non-	Level 1 x 10 s			Target	Non-	Level 1 x 10
		Risk Level of			Risk Level	Hazard	Cancer			Risk Level	Hazard	Cancer
Constituent of Concern	CAS#	1 x 10°5	Conctituant of Concorn	# 540	of 1 x 10°s	1.0	Hazard 1.0	Constituent of Constituent	# 545	of 1 x 10°5	1.0	Hazard 1.0
4-DDD	72-54-8	1285.36	ARSENIC	7440-38-2	13.98	269.70	13.98	BERYLLIUM	1	124.68	1531.77	124.68
HELDRIN	60-57-1	21.33	BERYLLIUM	7440-41-7	1.00	367.63	1.00	CHROMIUM	7440-47-3	NA	11599.58	11599.58
GAMMA CHLORDANE	5103-74-2	1200.48	CHROMIUM	7440-47-3	×××	2783.90	2783.90	4,4'-DDD	72.548	7712.14	1872.95	1872.95
4'-DDT	50-29-3	1285.36	4,4'-DDD	72-54-8	61.70	449.51	61.70	CHLORDANE	57-74-9	7202.86	1800.72	1800.72
LPHA CHLORDANE	5103-71-9	1200.48	CHLORDANE	57-74-9	57.62	432.17	57.62	ALDRIN	309-00-2	120.43	87.74	87.74
DRIN	309-00-2	20.07	4,4'-DDE	72-55-9	61.70	449.51	61.70	DIELDRIN	60-57-1	127.95	146.23	127.95
HEPTACHLOR	76-44-8	75.83	ALDRIN	309-00-2	0.96	21.06	96'0	4,4'-DDT	50-29-3	7712.14	1872.95	7712.14
CHLORDANE	57-74-9	1200.48	DIELDRIN	60-57-1	1.02	35.10	1.02	ALPHA BHC	319-84-6	324.96	NA	324.96
ALPHA BHC	319-84-6	54.16	4,4-DDT	50-29-3	61.70	449.51	61.70	GAMMA BHC (LINDANE)	58-89-9	1574.83	877.40	877.40
SAMMA BHC (LINDANE)	58-89-9	262.47	ALPHA BHC	319-84-6	2.60	NA	2.60	TOXAPHENE	8001-35-2	1861.16	NA	1861.16
OXAPHENE	8001-35-2	310.19	GAMMA BHC (LINDANE)	58-89-9	12.60	210.58	12.60	ENDRIN	72-20-8	NA	877.40	877.40
			TOXAPHENE	8001-35-2	14.89	NA	17.89	HEPTACHLOR	76-44-8	454.95	1462.34	454.95
			ENDRIN	72-20-8	Ž	210.58	210.58	TETRACHLOROETHENE 127-18-4	127-18-4	39370.69	29246.79	29246.79
			HEPTACHLOR	76-44-8	3.64	350.96	3.64					
			LEDTACUI OD EDOVIDE	4034 E7 9	4 00	040	00 7					

Notes: NA - Not Available